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November 1, 2024

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 11/4/2024

**VIA PACER**

The Honorable Vernon S. Broderick  
United States Courthouse  
Foley Square New York, NY 10007

**Re: SEC v. Thurlow, et al., 1:21-cv-07700-VSB (S.D.N.Y.)**

**Request for an Extension to File Response to Motion to Strike**

Dear Judge Broderick:

I am the attorney of record for Defendant Simon Thurlow and Defendant Richard Oravec, and I am writing this letter on behalf of these Defendants to request an extension of time to respond to Plaintiff's Motion to Strike.

On or about October 17, 2024, the Plaintiff filed its Motion to Strike certain defenses put forth by the Defendants. Defendant's response to the Motion was due on or about October 31, 2024. Unfortunately, after my mother-in-law recently passed away, my father-in-law became ill and on October 21<sup>st</sup> my wife and I were forced to drive to Connecticut due to the urgency, which is a 2 day drive each way. I did not return to Atlanta/my office until late night on October 30, 2024, and due to this emergency, I was unable to file a timely response. I spoke with Abby Rosen, the attorney for the Plaintiff SEC, and she has agreed to grant me a two-week extension, and consents to this letter request for the extension being filed today, until November 14, 2024 (Emails corroborating the Plaintiff's consent to my request are attached hereto).

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Therefore, I respectfully request that this Honorable Court grant undersigned counsel's request for the two week extension (until November 14, 2024) consented to by the Plaintiff, and issue an order reflecting the Court's grant of the requested extension.

Thank you, your Honor, for your consideration of this Request.

Respectfully submitted,

/s/ Joseph A. Siciliano, Jr.

Joseph A. Siciliano, Jr.  
Attorney for Defendants  
Thurlow and Oravec